

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,)	INDICTMENT
)	
Plaintiff,)	(18 U.S.C. § 117(a)(1))
)	(18 U.S.C. § 1151)
v.)	(18 U.S.C. § 1152)
)	
CHRIS NEIL FERGUSON,)	
)	
Defendant.)	

CR 11-306 MJD/LIB

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Domestic Assault by an Habitual Offender)

On or about December 19, 2009, in the State and District of Minnesota and within the exterior boundaries of the Bois Forte Indian Reservation, the defendant,

CHRIS NEIL FERGUSON

did, commit a domestic assault against Jane Doe, an Indian, a person similarly situated to a spouse. This domestic assault was committed after CHRIS NEIL FERGUSON was convicted on at least two prior occasions in St. Louis County District Court, State of Minnesota, for the following offenses that would be, if subject to Federal jurisdiction, any assault, sexual abuse, and serious violent felony against a spouse or intimate partner, to-wit: Felony Domestic Assault in violation of Minn. Stat. § 609.2242 from St. Louis County District Court, Duluth, Minnesota, date July 10, 2008; and Gross Misdemeanor Domestic Assault in violation of Minn. Stat. § 609.2242.2 from St. Louis County District Court, Virginia, Minnesota, date October 9, 2002 in violation of Title 18, United

SEP 21 2011

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United States v. Chris Neil Ferguson

States Codes, Sections 117(a)(1), 1151 and 1152.

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON